

REMARKS

Applicants thank the Examiner for the courtesy of a telephonic interview on December 13, 2005. Applicants' representatives, Frank R. Agovino, and (Arthur) Tan-Chi Yuan, discussed the invention in general and the cited references. In particular, Applicants pointed out distinctions between claim 47 and the Winamp reference in which Applicants referred to Figure D of the Applicants' Exhibit 1 of Amendment C, showing that a movement of an edge does not cause a movement of an adjacent edge of the windows of Winamp software, version 2.10. The Examiner will review the Winamp reference in detail by downloading a copy of the software. (Applicants forwarded an Internet link to the Examiner for downloading the software.) The Examiner and the Applicants also discussed claim 1 in light of the cited references. No agreement was reached.

Applicant has thoroughly considered the November 3, 2005 Final Office action and the Examiner's remarks. Applicant has amended the application to more clearly set forth the invention. Claims 1-51 are presented in the application for further examination. Claims 1-2, 6, 18, 19, 21, 27-28, 29, 31, 35, 38, 41, 43-44, and 47-49 have been amended by this Amendment D. Favorable reconsideration of the application as amended and in view of the following remarks is respectfully requested.

Claims 6, 19, 29, 31, 48, and 49 have been amended to correct some informalities. No new matter has added.

Claim Rejection under 35 U.S.C. §103(a)

Claims 1-8, 14-18, 21, 27, 35-37, 41-46, and 51 were rejected under 35 U.S.C. §103(a) as being obvious over Malamud et al., U.S. Patent No. 5,694,561 ("Malamud patent") and Beaudet et al., U.S. Patent No. 5,491,795 ("Beaudet patent"). Applicant respectfully disagrees and argues that the combined references fail to teach or suggest each and every element of the claims as amended. In particular, the combined references fail to teach or suggest at least the combination of specifying the first and second independent sets of instructions changing the content of the particular selected scope item by defining first and second primary objects to be displayed in first and second primary display windows, respectively.

Amended claim 1 recites, in part:

receiving from a user and/or an administrator a first set of instructions changing the content of the particular selected scope item by defining one or more first primary objects to be displayed in a first primary display window...;
receiving from a user and/or an administrator a second set of instructions: changing the content of the particular selected scope item by defining one or more second primary objects to be displayed in a second primary display window, wherein the first set of instructions is independent of the second set of instructions; so that the one or more first primary objects displayed in the first primary display window are independent of the one or more second primary objects displayed in the second primary display window....

As amended, embodiments of the invention provide dynamic linking windows to allow administrators and/or users to create, organize, and link windows independent of each other. For example, an administrator may create a first set of instructions for a particular scope item by passing a set of parameters or script to be executed for a group of users (e.g., a Guest group) such that, when a member of the Guest group selects the particular scope item, a set of the content of the selected scope item would be available to the Guest group members and not to other groups. Similarly, another user may set a second set of instructions for another group of users such that, when the same particular scope item is selected from the scope window by members of the another group, another set of the content of the selected scope item would be displayed or presented to the another group of users. Therefore, dynamic linking of windows and the content of the selected scope window through the first set of instructions and the second set of instructions make the contents of windows, the placement of windows and the relationship between windows be created, defined and controlled by administrators or users. As such, the user or administrator may specify the combination of the first and second sets of instructions defining first and second primary objects displayed in first and second primary display windows, respectively. (See also, Application, page 1, lines 21-27; page 2, lines 1-13).

In contrast, neither the Malamud patent nor the Beaudet patent teaches or suggests such a combination. In addition to the arguments presented in the Remarks of previous Amendments, Applicant argues that the linking between the windows and that each window has a separate link such they can be opened and closed separately of the cited references fail to teach or suggest at least the feature of "receiving from a user and/or an administrator a first set of instructions changing the content of the particular selected scope item by defining one or more first primary

objects to be displayed in a first primary display window." The mere fact that the Malamud and Beaudet patents teach that the windows may be opened and closed separately only suggest that each and every user, when attempting to send instructions (e.g., a mouse click) to open or close windows, would be sending the same instructions. That is, the instructions are hard-coded.

On the other hand, embodiments of the present invention do not suggest a hard-coded linking between windows, such as maximizing or minimizing windows (Final Office action, page 21, lines 13-22), but a dynamically linked window and the contents of the windows such that a user or an administrator may set instructions to change how the contents of the selected scope item to be displayed.

Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection because the combined references of the Malamud and Beaudet patents fail to teach or suggest each and every element of the invention in combination. As such, claim 1 and its dependent claims 2-8 and 14-17 are patentable over the cited art. Therefore, the rejection of claims 1-8 and 14-17 under 35 U.S.C. §103(a) should be withdrawn.

Similarly, amended claim 18 recites, in part, "a first primary display window ... dynamically linked to the selected scope item as defined by a first set of instructions specified by the user, said first set of instructions changes the content of the particular selected scope item; and a second primary display window ... dynamically linked to the particular selected scope item as defined by a second set of instructions specified by the user, said second set of instructions changes the content of the particular selected scope item". For at least the reasons argued above in claim 1, Applicant argues that neither Malamud nor Beaudet teaches or suggests at least this feature of changing the content of the particular selected scope item because opening/closing or maximizing/minimizing of windows would only display items (e.g., icons).

As such, the Examiner has not established the *prima facie* elements of an obviousness rejection because the combined references fail to teach or suggest the combination discussed above. As such, claim 18 is patentable over the cited art, and the rejection of claim 18 under 35 U.S.C. §103(a) should be withdrawn.

Amended claim 21 provides similar recitals, such as, for "receiving from the user a first set of instructions for changing the content of the selected scope item by defining one or more first primary objects to be displayed in a first primary display window...; receiving from the user a second set of instructions for changing the content of the selected scope item by defining one

or more second primary objects to be displayed in a second primary display window...". Because neither the Malamud patent nor the Beaudet patent teaches or suggests at least the combination, Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection. As such, claim 21 is patentable over the cited art. Therefore, Applicant respectfully requests the rejection of claim 21 under 35 U.S.C. §103(a) be withdrawn.

Amended claim 27 also recites, in part, "means for receiving from a user a first set of instructions for changing the content of the retrieved scope item by defining first primary objects to be displayed in a first primary display window and for receiving from the user a second set of instructions for changing the content of the retrieved scope item by defining second primary objects to be displayed in a second primary display window...." Again, as the hard-coded linking and instructions (e.g., mouse clicks) of the combined references fails to teach or suggest the combination of the first and second sets of instructions that changes the content of the retrieved scope item by defining first and second primary objects, respectively, Applicant submits that claim 27 is also patentable over the cited art.

Amended claim 35 similarly recites, in part, a computer system comprising "means for receiving from the user a first set of instructions for changing the content of the particular selected scope item by defining first primary objects to be displayed in the first primary display window and for receiving from the user a second set of instructions for changing the content of the particular selected scope item by defining second primary objects to be displayed in the second primary display window...". As argued previously, the combined references of the Malamud and Beaudet patents fail to teach or suggest at least the combination of the first and second sets of instructions of embodiments of the invention. Therefore, Applicant submits that claim 35 and its dependent claims 36-37 and 51 are patentable over the cited art and the rejection under 35 U.S.C. §103(a) should be withdrawn.

Similarly, amended claims 41, 43, and 44 recite at least the features that include the combination of specifying the first and second independent sets of instructions changing the content of the selected scope item by defining first and second primary objects to be displayed in first and second primary display windows, respectively. As such, Applicant argues that the Examiner fails to establish the *prima facie* elements of an obviousness rejection and requests that the rejection of claims 41-46 under 35 U.S.C. §103(a) be withdrawn.

Claims 9-13, 19-20, 22-26, 28-34, and 38-40 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Malamud patent, the Beaudet patent and Ku et al. U.S. Patent No. 6,421,072 ("Ku patent"). The Ku patent, in addition to discussions and arguments presented in previous Amendments, merely teaches an improved way to represent information in multi-window environment using a tree structure. Like the Malamud and the Beaudet patents, the Ku patent fails to teach or suggest dynamically linking objects in response to instructions from the user. As such, Applicant argues that, because the Ku patent fails to cure the deficiencies of both the Malamud and Beaudet patents, the combined references fail to teach or suggest each and every element of the invention in combination. Claims 9-13 depend from claim 1, claims 19-20 depend from claim 18, and claims 22-26 depend from claim 21 and, for at least the reasons explained above, these dependent claims are patentable over the cited art for at least the reasons of claims 1, 18, and 21, respectively. Therefore, rejection of claims 9-13, 19-20, and 22-26 under 35 U.S.C. §103(a) should be withdrawn.

Amended claim 28 recites "...said first set of instructions from the user or administrator changing the content of the particular selected scope item...; said second set of instructions from the user or administrator changing the content of the particular selected scope item...". Because the combined references of the Malamud, Beaudet, and Ku patents continue to fail to teach or suggest the dynamic linking feature of embodiments of the invention as recited, Applicant argues that the Examiner fails to establish the *prima facie* elements of an obviousness rejection. Therefore, Applicant requests that the rejection of claim 28 and its dependent claims 29-34 under 35 U.S.C. §103(a) be withdrawn.

Amended claim 38 recites, in part, a computer system comprising "means for receiving from the user a first set of instructions for changing the content of the particular selected scope item defining first primary objects... and for receiving from the user a second set of instructions for changing the content of the particular selected scope item defining second primary objects...". Again, the combined references fail to discuss or suggest that the combination that the user can specify the first and second sets of instructions to change the content of the particular selected scope item by defining first and second primary objects to be displayed in the first and second primary display windows, respectively, in the Malamud, Beaudet, and Ku patents. Because the Examiner fails to establish the *prima facie* elements of an obviousness rejection,

Applicant submits that the rejection of claim 38 and its dependent claims 39-40 under 35 U.S.C. §103(a) be withdrawn.

Claims 47-49 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Malamud patent in view of Winamp (version 2.10, released 03/24/99) ("Winamp reference"). Applicant respectfully disagrees and argues that the combined references continue to fail to teach or suggest each and every element of the invention. Claim 47 was amended to further clearly set forth the invention. Applicant maintains that FIGS. A-D of Applicant's Exhibit 1 of Amendment C clearly illustrated that the Winamp reference fails to that movement of one adjacent edge causes movement of the other adjacent edge. Therefore, Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection and requests that rejection of claims 47-49 under 35 U.S.C. §103(a) be withdrawn.

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PATENT**CONCLUSION**

In light of the foregoing, Applicant respectfully submits that claims 1-51 are in condition for allowance and respectfully request favorable reconsideration of this application. The fact that Applicant may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicant's agreement therewith.

Applicant wishes to expedite prosecution of this application. If the Examiner deems the claims as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency or overpayment of any required fee during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,



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